

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Thomas Dexter Jakes
Plaintiff

~against~

Duane Youngblood et al.
Defendant

Civil Action No. **2:24-CV-1608-WSS**

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that Defendant Duane Youngblood, by and through his undersigned counsel, will and hereby does move this Court before the Honorable William S. Stickman IV, United States District Judge for the Western District of Pennsylvania, for an Order dismissing the Complaint in its entirety, with prejudice, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

This motion is based upon the accompanying Memorandum of Law, the [Proposed] Order, all pleadings and papers on file in this matter, and such other argument and evidence as may be presented to the Court.

DATED: May 6, 2025

Respectfully submitted,

/s/ Tyrone A. Blackburn
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